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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN - 2 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

BILLED PARTY PREFERENCE FOR)
INTERLATA CALLS)
_____)

CC Docket No. 92-77

COMMENTS OF SPRINT COMMUNICATIONS COMPANY

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SUMMARY

The concept of requiring IXC's to share billing and validation data for calling cards used for 0+ access -- commonly known as "0+ public domain" -- is a misguided solution for the very real structural problems in the calling card and public phone market segments. AT&T has two mutually reinforcing advantages today. First, because of AT&T's dominant share of presubscribed public phones -- close to 80% -- AT&T's cardholders can reach AT&T from four out of every five phones simply by dialing 0+. This gives AT&T's card a convenience advantage that no other IXC can match. Second, AT&T's inheritance of the former Bell System calling card base and its issuance of proprietary cards to 25 million customers serve to entrench its position in the presubscription of public phones. Since AT&T has more proprietary cards outstanding than any other carrier, it "controls" more traffic than any of its competitors and can promise premises owners a higher volume of commissionable calls than any other carrier. Billed Party Preference is the best answer to these problems: it would allow all IXC's to offer their customers proprietary cards with 0+ dialing convenience, and would focus competition on the consumer rather than on the public phone premises owners.

If 0+ public domain applies to any card that is capable of being used on a 0+ basis, it could result in great harm to consumers and to IXC's. At the present time, there is no way for IXC's to block 0+ access from phones that are presubscribed to them without also blocking 10XXX access, the mode of access the

Commission has recently found to be the superior access code for operator services. If Sprint and other carriers who legitimately wish to keep their calling cards proprietary were forced into using some other form of access, the Commission would be subjecting consumers to the added time and inconvenience of dialing extra digits to reach their carrier of choice.

Furthermore, 0+ public domain would be expensive and time-consuming to implement. IXCs subject to 0+ public domain would have to reissue their calling cards in a standard numbering format so the identity of the issuing carrier can be recognized by the carrier accepting the call. Furthermore, the IXCs would have to agree on terms for validation database access and either for billing and collection service or billing name and address information. This whole process is likely to take two years, a period of time that could be better spent working towards implementation of Billed Party Preference. Finally, if the calling cards of major IXCs become nonproprietary, the market advantage will accrue to the alternative operator service providers that charge high rates to the public: they will be able to accept more calls than they can today and will be able to use their high rates to fund higher commission payments to premises owners. Unfortunately, under these circumstances, it is the consumers who would suffer the most.

If the Commission wants to take some interim action before implementing Billed Party Preference, it would be far better for the Commission to simply prohibit IXCs from paying commissions on proprietary card traffic than to attempt to implement 0+ public domain.

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COMMENTS OF SPRINT COMMUNICATIONS COMPANY

Sprint Communications Company hereby submits its comments on the issue of proprietary calling cards and 0+ access raised in the Commission's May 8, 1992 Notice of Proposed Rulemaking in the above-captioned proceeding (FCC 92-169).

In the NPRM, the Commission tentatively found that Billed Party Preference should be employed for 0+ calling, to enable consumers to reach their preferred operator service provider simply by dialing "0+." However, the Commission also sought comment, under an expedited pleading cycle, on whether, prior to the adoption of Billed Party Preference, it should require IXCs to share billing and validation data with other IXCs "for any calling card usable with 0+ access" (NPRM, para. 36). It is to this interim issue that these comments are directed.

I. INTRODUCTION AND SUMMARY OF POSITION.

The proposal to require the sharing of billing and validation data for cards that use 0+ access, commonly referred to as "0+ public domain," was proposed by MCI and various alternative operator service ("AOS") providers as a response to very legitimate concerns about AT&T's market power

under the current system of presubscription of public phones. As Sprint has previously explained (see, e.g., Supplemental Comments of United Telecom, filed November 22, 1991 in RM-6723), AT&T has two advantages today in the operator service/calling card market.

First, because of its dominant share of presubscribed public phones -- which Sprint estimates to be close to 80 percent -- AT&T's cardholders enjoy a dialing convenience that no other carrier can match, since they can reach AT&T from four out of every five public phones simply by dialing 0+. By contrast, if Sprint or other IXC cardholders tried to dial 0+, they would reach the wrong carrier from at least nine out of ten public phones. Thus, Sprint and other AT&T competitors instruct their cardholders always to dial an access code: 10XXX, 800, or 950. Having to dial these extra digits places the cards of AT&T's competitors at a distinct disadvantage in the calling card market.

Second, AT&T's recent issuance of some 25 million proprietary cards to its existing base of calling card customers,¹ gives AT&T a powerful weapon in persuading premises owners that they should presubscribe their public phones to AT&T. Because AT&T has the largest base of proprietary cards, it has the most "captive traffic" that no other presubscribed operator service provider can handle. This gives AT&T three

¹See AT&T's Opposition to Comptel's Motion for an Interim Order, filed February 10, 1992 in CC Docket No. 91-115, n. ** at 9.

advantages over its competitors. First, AT&T can promise a higher volume of commissionable calls to the premises owner than any other carrier. Since presubscription of public phones is largely driven by commission payments, AT&T's greater volume of commissionable traffic gives it a decided advantage over its competitors. Second, when AT&T's competitors have to transfer or turn away calls made with AT&T's proprietary cards, they incur costs in the form of access charges, operator time and switch usage for which they receive no revenue. Finally, even apart from commission payments, many premises owners will favor AT&T simply to minimize inconvenience to their customers.

These advantages of AT&T in the calling card and presubscription market segments have a synergistic effect. AT&T's large base of proprietary cards enables it to increase its penetration of the public phone presubscription market, which further increases the percentage of phones from which its customers enjoy 0+ dialing convenience, which, in turn, further enhances the attractiveness of its calling cards vis-a-vis those of its competitors, which, in turn, reinforces AT&T's argument that public phone premises owners should persubscribe to its service, and so on. These advantages of AT&T stem not from any particular business acumen on its part, but are rather the product of its inheritance of the entire Bell System base of calling card customers at divestiture, and the fact that it began with a 100 percent market share of public phones as a result of its former monopoly position.

At the same time, Sprint recognizes that there are legitimate reasons why AT&T, or any other IXC, would want to issue a proprietary card. It does not want uninformed or confused customers who may think they are using AT&T (because they are using an AT&T card) to be victimized by the exorbitant charges of some of the AOS providers. Moreover, Sprint and other IXCs are beginning to offer a number of value-added features to their cards, such as conference calling and voice messaging services, and these services can work only if the cardholder reaches the IXC that has issued the card. Sprint continues to believe that Billed Party Preference is the best answer to both the present market imbalance that favors AT&T, and to the legitimate interests IXCs have in issuing proprietary cards to their customers. Billed Party Preference would give all IXCs equal access to their customers with 0+ dialing convenience, thus eliminating the 0+ advantage AT&T now enjoys, and, most important of all, competition will be focused where it belongs: on providing the best possible service at the lowest possible price to the consumer, rather than on who can promise the highest commissions to the public phone premises owners, as is the case under the current system.

As will be explained in more detail below, in addressing specific issues on which the Commission has requested comment, 0+ public domain, depending on how it is defined and implemented, could, at best, do little to correct the existing imbalances in the marketplace. For example, if the "proprietary" nature of the card is determined by the dialing

instruction given by the long distance carrier, AT&T could keep its cards proprietary by changing its dialing instructions, although in practice the cards could still be used for 0+ dialing at phones presubscribed to AT&T. Since that is the customary method of access for AT&T's cardholders at the present time, a significant portion of AT&T's cardholders are likely to continue to access AT&T by dialing 0+ even after AT&T issues contrary instructions. Thus, AT&T would still have the advantage of the ease of 0+ dialing in fact.

If, on the other hand, the proprietary nature of the card is defined in terms of whether it is capable of being used on a 0+ basis (even when the IXC instructs its cardholder always to use an access code), then the calling cards of Sprint and other IXCs might be deemed "non-proprietary." It can be expected that AT&T and AOS providers would widely advertise that on phones presubscribed to them, the Sprint and MCI cards, for example, can be used on a "0+" basis from the phone. The result would be that Sprint and MCI would only be able to capture a minor fraction of the calls made over their calling cards. While Sprint and MCI would have an opportunity to handle calls made with AT&T cards that are now proprietary, whether that additional traffic would outweigh the loss of Sprint or MCI card traffic to other carriers would depend on the number of public phones presubscribed to Sprint and MCI. However, in a 0+ public domain environment, the presubscription advantage is likely to accrue to the alternative operator service providers, who, because they charge rates that are often far higher than those of the full service IXCs, could

promise higher premises-owner commissions that their excessive rates would permit them to pay. The biggest losers in such a scheme ultimately would be the members of the public who would have to pay these higher charges for their calls.

In short, Sprint believes that the 0+ public domain concept would not be effective in redressing the existing competitive imbalances. Moreover, 0+ public domain would not address the underlying cause of many problems in the operator services market: the focus on premises owner commission payments. Sprint believes the Commission should proceed with an expeditious investigation of and implementation of Billed Party Preference as the optimum solution to these problems. If the Commission wishes to take any action in the interim, it may wish to consider, instead of 0+ public domain, prohibiting IXCs from paying commissions on proprietary card traffic. While this would do nothing to alter AT&T's existing ease-of-access advantage in the calling card market, it would lessen somewhat AT&T's ability to use its power in that market as leverage to increase its market share of public phones.

II. RESPONSES TO SPECIFIC QUESTIONS POSED IN THE NPRM.

In para. 43 of the NPRM, the Commission posed several specific issues it wants the parties to address. Sprint will comment on each of those issues in turn.

1. How And By Whom The Choice Between A Proprietary Access Code And A Nonproprietary 0+ Card Should Be Made.

Sprint believes that each interexchange carrier ought to have the option of choosing whether its card is proprietary or non-proprietary. As discussed above, Sprint submits that IXC's have a legitimate interest in issuing proprietary cards to their customers, both to keep their customers from falling into the hands of AOS providers that charge unreasonable rates,² and so that they can offer value-added features such as conferencing and voice messaging services.

2. How IXC's Would Distinguish And Screen Proprietary And Nonproprietary Card Calls.

The IXC can screen calls only by validating the calling card number. If the calling card is issued by a LEC, it can be validated through the LIDB database. If the card is issued by another IXC, then either the card number must identify the issuing IXC (e.g., the CIID Numbering Plan or the CCITT "891" numbering plan, both of which identify the issuing carrier in the first six digits of the card number), or the IXC must run the card number against all databases to which it has access

²When that happens, that in turn can cause problems for the IXC issuing the card. The customer who uses an IXC's card may not realize the operator service provider is a different carrier and may blame the IXC for the high rates charged by the AOS provider. The IXC can thus suffer the ill will of its customers and incur the time and expense of addressing the customer's complaints.

to determine whether the number is valid.³ If the IXC has access to the database of the issuing carrier then, by definition, it is a non-proprietary card. If the IXC cannot access the database of the issuing carrier, or cannot determine who the issuing carrier is, then the call must be rejected unless the customer is willing to use another means to bill the call.

3. Whether Carriers Should Be Obligated Merely To Instruct Proprietary Cardholders To Dial Access Codes, Or Whether They Should Also Be Required To Reject 0+ Calls By Customers Using Proprietary Calling Cards.

This is a crucial issue in terms of how 0+ public domain is defined. Although Sprint has always instructed its calling card customers to dial an access code to reach its operator services, it is possible, if the phone is presubscribed to Sprint, for the caller to access Sprint simply by dialing 0+.⁴ Sprint has no way of blocking 0+ access without also blocking access via 10XXX, which Sprint has recently implemented in order to reduce the number of digits required to access its operator services.⁵ Once the LECs deploy SS7 down to the end office level, Sprint would be able to block 0+ access without also blocking 10XXX access, but the completion of such

³However, there may be instances where, because of overlapping numbering schemes, it is not possible to determine whether a particular card number is proprietary or not, or valid or not, or who the issuing carrier is.

⁴Sprint believes that the same is true for MCI as well.

⁵Formerly, Sprint relied exclusively on 800 access; its 800 access is still usable, but requires the customer to dial an additional six digits.

deployment may be several years away. Because of these technical barriers to blocking 0+ access, it would be highly unfair for the Commission to require Sprint or any other IXC to block 10XXX access as well in order to maintain its card as a proprietary card. Sprint recently invested a considerable sum to open up 10XXX access to reduce partially the dialing inconvenience, vis-a-vis AT&T's near-universal 0+ access, of its calling card, and the Commission has recognized in CC Docket No. 91-35 the superiority of 10XXX as compared with 800 and 950 access.⁶ Having made these findings, it would be arbitrary and capricious to force IXCs to give up 10XXX access in order to keep their cards proprietary.

Furthermore, forcing Sprint and other competitors of AT&T to give up the proprietary nature of their calling cards because they cannot block the use of those cards on 0+ access from phones that are presubscribed to them would be meaningless, given their present numbering formats. No other carrier could accept a Sprint or MCI card, because no other carrier could determine which carrier issued the card, unless it accessed the databases of every IXC, a process that would add to the IXC's costs and would inconvenience the public by increasing call set-up time. The only way around this problem would be to require Sprint and the other IXCs to issue new cards in a standard numbering format so that the issuing

⁶ See Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation 6 FCC Rcd 4736, 4739 (para. 10) (1991), recon. pending.

carrier could be readily identified by other IXCs. The issuance of new cards in a new numbering scheme, and the related "education" of its customers, would cost Sprint in the neighborhood of \$20 million, and to undertake this process in an efficient and orderly fashion could require two or more years to complete. As discussed above on pp. 5-6, it is not at all clear that AT&T's card-issuing competitors would gain any benefits from this expensive undertaking, and the public at large may be the big losers in the process if the AOS providers charging high rates increase their share of public phone presubscription.

Thus, if the Commission adopts 0+ public domain, it has no reasonable alternative but to define a proprietary card on the basis that the issuing carrier instructs its cardholders to dial an access code.

4. What Information Would Have To Be Available To Enable OSPs To Carry And Bill For Nonproprietary 0+ Calls.

If, as a result of adoption of the 0+ public domain concept, those IXCs that currently have proprietary cards were compelled to make them non-proprietary, the IXC accepting the call would (1) have to be able to recognize the card issuer;⁷ (2) need to access the card issuer's database; and (3) either have to obtain access to the billing name and address ("BNA")

⁷As discussed above, this would either necessitate multiple database look-ups -- which still would not preclude the possibility of overlapping numbers -- or reissuance of cards in a standardized numbering format.

associated with the calling card number or have to reach a satisfactory billing and collection agreement with the issuing IXC. This might force AT&T's competitors to spend millions of dollars issuing new cards or alternatively necessitate multiple database lookups for every call (see the preceding footnote), and would require the establishment of linkages between proprietary IXC databases, and negotiation of billing and collection or BNA agreements between IXCs that do not exist today. Judging from the time it has taken to negotiate access to the LECs' LIDBs, this process could take in the neighborhood of two years. Furthermore, since billing and collection is regarded by the Commission as being outside the scope of Title II, and because of the uncertain status of BNA information,⁸ it is highly questionable whether AT&T would grant its competitors the ability to bill and collect for calls made by AT&T's cardholders on reasonable terms. Thus, 0+ public domain would probably not be workable unless the Commission were willing and able to closely supervise the billing and collection relationships among the IXCs.

⁸See Policies of Rules Concerning Local Exchange Carrier Validation and Billing Information For Joint Use Calling Cards, Report and Order and Request for Supplemental Comments (FCC 92-168), released May 8, 1992 (requesting further comments on the Commission's jurisdiction over BNA and related issues).

5. The Impact The Above-Described Proposal Would Have On Consumers.

As indicated above, Sprint is skeptical whether 0+ public domain would be of any substantial benefit to the public. If proprietary cards were defined by the dialing instructions given by the IXC, presumably AT&T would merely instruct all of its cardholders to begin using its 10XXX or 800 access codes. This would do nothing to stem its present advantage in the presubscription of public phones, and may do little, if anything, to mitigate the ease-of-use advantage that AT&T's calling card now enjoys over cards issued by other IXCs. The more knowledgeable AT&T customers would be quick to discover that they can continue to reach AT&T simply by dialing 0+ on the phones that are presubscribed to AT&T. The less sophisticated and informed customers who would follow AT&T's instructions to use an access code, on the other hand, would be inconvenienced by having to use more digits to access AT&T (at least from phones presubscribed to that carrier) than they do today.

If the proprietary nature of a card were determined by whether or not 0+ access was blocked by the card-issuing IXC on phones that are presubscribed to it, the public would be much worse off. IXCs would be forced to make their cards non-proprietary or discontinue 10XXX access (because of the inability to block 0+ calls without also blocking 10XXX 0+ calls). If they chose the former alternative and made their cards non-proprietary, then the AOS providers that charge high rates for operator services would be able to accept IXC cards

that they cannot honor today, and would be able to significantly increase their penetration of the public phone market, because of the generous commission payments to premises owners that their high rates make possible. This would mean that the public would be subjected to these high rates from a greater number of phones than is presently the case, a clear disadvantage to the public. In the alternative, if IXCs chose to block 10XXX access in order to keep their cards proprietary, customers of those carriers who now use 10XXX (or, in AT&T's case 0+) would have to dial a greater number of digits in order to reach their preferred carrier.

6. The Impact This Proposal Might Have On The Costs And Benefits Of Billed Party Preference Or The Timeliness With Which It Could Be Implemented.

In the past, 0+ public domain has been touted as a transitional step towards Billed Party Preference.⁹ Sprint believes that 0+ public domain is antithetical to the concept of Billed Party Preference: the concept of 0+ public domain is that 0+ calls are routed to the presubscribed carrier, regardless of whether that carrier is the customer's preferred carrier. The concept of Billed Party Preference, by contrast, is that dialing 0+ will connect the customer automatically to the customer's preferred carrier. Thus, under a system of 0+ public domain, customers who fear the prospect of being

⁹See e.g., MCI's August 15, 1991 Comments in CC Docket No. 91-115, at 5.

connected to an AOS provider that may charge excessive rates will train themselves to avoid 0+ dialing. To then be told a short time later that they should always dial 0+ to reach their preferred carrier will simply add to the confusion that already exists among the public at large.

In addition, the expense incurred in setting up links between IXC validation databases and billing and collection mechanisms to implement 0+ public domain would be rendered unnecessary under Billed Party Preference. The need to recover these costs promptly, before Billed Party Preference is implemented, would drive up operator service rates to the public in the meantime. Furthermore, as discussed above, it can be expected that the negotiations to interconnect validation databases and to reach billing and collection or BNA agreements may be lengthy and difficult processes that could take as much as two years. Sprint submits that this two-year period would be better spent focusing the energies of the industry and the Commission on the steps that need to be taken to implement Billed Party Preference.

III. AN ALTERNATIVE TO 0+ PUBLIC DOMAIN WOULD BE TO PROHIBIT PREMISES OWNER COMMISSIONS ON PROPRIETARY CARD TRAFFIC.

Finally, the Commission invited parties to discuss alternative proposals for addressing the inequities in the existing market, and to address the basis of the Commission's jurisdiction to implement such alternatives. While, as indicated above, Sprint believes the Commission should focus its resources on prompt implementation of Billed Party

Preference, if the Commission wishes to take some other action in the interim, Sprint would suggest that the Commission prohibit interexchange carriers from paying commissions to premises owners on public phone calls made via the presubscribed carrier's proprietary card. This would do nothing to counteract one of AT&T's two advantages -- the dialing convenience of 0+ access from the vast majority of phones. However, it would prevent AT&T from leveraging this convenience and the large base of calling card customers it inherited at divestiture into a remonopolization of public phone presubscription. All IXCs and alternative operator service providers would be able to compete, on equal terms, for public phone presubscription on the basis of commissions on traffic from non-proprietary cards, e.g., cards issued by local exchange carriers. As for the Commission's jurisdiction, Sprint submits that the Commission, if it wished to prohibit payment of commissions on proprietary card traffic, could declare such payments to be an unreasonable practice under Section 201(b) of the Act.¹⁰

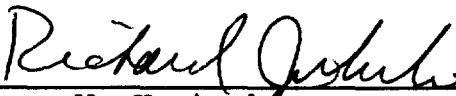
¹⁰The FCC has previously invoked Section 201(b) to control the payment of commissions to premises owners, and there is no reason why it could not do so in this case as well. See AT&T's Private Payphone Commission Plan, 3 FCC Rcd 5835, 5837 (para. 28) (1988).

IV. CONCLUSION

Although the 0+ public domain concept was proposed by others to deal with a very real problem -- AT&T's synergistic advantages in the calling card and public phone presubscription market segments -- it is a plan that could be difficult and expensive to implement, and could be injurious to AT&T's card issuing competitors (depending on how the plan is defined). Even under the best of circumstances, 0+ public domain may be of only marginal value in leveling the current playing field, while at its worst, it could seriously injure consumers and IXCs. Furthermore, 0+ public domain will inevitably detract from, rather than complement, Billed Party Preference, which Sprint continues to believe is the best way to promote a competitive industry that is responsive to consumer needs.

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